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8 Attorneys for Plaintiff  
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

No. CR 18-774 (A)-JAK-3

13 Plaintiff,

GOVERNMENT'S PROPOSED VOIR DIRE

14 v.

Trial Date: June 7, 2022

15 ALEJANDRO SANDOVAL,  
aka "Squeaky,"

Time: 8:30 A.M.

16 Defendant.

Location: Courtroom of the  
Hon. John A.  
Kronstadt

19 Pursuant to Federal Rule of Criminal Procedure 24(a)(2)(B),  
20 plaintiff United States of America, by and through its counsel of  
21 record, the United States Attorney for the Central District of  
22 California and Assistant United States Attorney Shawn T. Andrews,  
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1 respectfully requests that the Court ask prospective jurors the  
2 attached questions during voir dire, in addition to the Court's  
3 standard voir dire questions.

4 Dated: May 16, 2022

Respectfully submitted,

5 TRACY L. WILKISON  
United States Attorney

6 SCOTT M. GARRINGER  
7 Assistant United States Attorney  
Chief, Criminal Division

8  
9 /s/  
10 SHAWN T. ANDREWS  
Assistant United States Attorney

11 Attorneys for Plaintiff  
12 UNITED STATES OF AMERICA

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1                   **GOVERNMENT'S PROPOSED VOIR DIRE**

2                   **I.    PRIOR EXPERIENCE WITH CRIMINAL CASES/LAW ENFORCEMENT**

3                 1.    Have you or anyone close to you ever been involved in a  
4                 criminal case as a victim, a defendant, or a witness?

5                   a.    What type of case was it?

6                   b.    What was your relationship to that case?

7                   c.    When did the case take place?

8                   d.    Where did the case take place?

9                   e.    Was anyone arrested?

10                  f.    Which law enforcement agency was involved?

11                 2.    Have you or any close to you ever had a negative experience  
12                 with the police, the FBI, or any member of law enforcement?

13                   a.    Who had the experience?

14                   b.    What was the experience?

15                   c.    When was the experience?

16                   d.    Which law enforcement agency was involved?

17                 e.    Do you have any feelings or beliefs - either positive  
18                 or negative - about law enforcement based on that experience?

19                 f.    Do you have any feelings or beliefs - either positive  
20                 or negative - about the criminal justice system based on that  
21                 experience?

22                 g.    Is there anything about your experience that would  
23                 prevent you from being a fair and impartial juror?

24                 3.    Have you or anyone close to you ever filed a lawsuit or a  
25                 complaint concerning the conduct of the police, the FBI, or a law  
26                 enforcement officer?

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1       4. Have you or anyone close to you ever been accused,  
2 arrested, indicted, charged, or convicted in a criminal case (this  
3 excludes infractions such as traffic offenses)?

- 4           a. What type of case was it?  
5           b. When was the case?  
6           c. What was the accusation/charge?  
7           d. What was the outcome?

8       5. Do you have any personal feelings or beliefs about the  
9 police, the FBI, or law enforcement officers that would prevent you  
10 from making a fair assessment about the testimony of the law  
11 enforcement officers who will testify in this case?

12       6. Do you have any personal feelings or beliefs about the  
13 criminal justice system that would prevent you from reaching a fair  
14 and impartial verdict in this case?

15 **II. GENERAL ABILITY TO SERVE AS A JUROR ON THIS CASE**

16       7. If you are selected as a juror and hear this case, you will  
17 be required to deliberate with other jurors. This will require you  
18 to discuss the evidence and the law in this case with your other  
19 jurors. Is there anything in your experience that leads you to  
20 believe that you would be unable or unwilling to engage in such  
21 discussions?

22       8. The potential punishment for the offenses charged in the  
23 indictment is a matter that can never be considered by a jury in  
24 arriving at an impartial verdict as to the guilt or innocence of an  
25 accused. Will each of you be able to conduct your duties as jurors  
26 in this case without speculating about or being influenced in any way  
27 by whatever punishment may or may not be imposed in this case?

1       9. Some people who, for moral, ethical, or religious reasons,  
2 may find it difficult or uncomfortable to pass judgment on the  
3 conduct of others. Is there anyone who holds such beliefs, or who  
4 might be affected by such beliefs?

5       10. Is there anything about the charges in this case that makes  
6 you think you could not be a fair and impartial juror in this case?  
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